

Cc: Vaughn, Stephanie[Vaughn.Stephania@epa.gov]; Flanagan, Sarah[Flanagan.Sarah@epa.gov]
To: Basso, Ray[Basso.Ray@epa.gov]
From: Michael Barbara
Sent: Sat 9/12/2015 12:35:52 AM
Subject: Re: Fw:

Ray, thanks for the response. I will pass this along and we can discuss further next week.

Mike Barbara
Sent from my iPad
(908) 510-5703

On Sep 11, 2015, at 5:12 PM, Basso, Ray <Basso.Ray@epa.gov> wrote:

Mike,

This is a follow up response to your email of Sept. 3rd. As you suggest, EPA will review the draft QAPP worksheets you plan to send us this week and then get back to you with our feedback, in writing. We can then make a decision as to whether to proceed with development of a sampling program, or if it makes more sense to continue the formal dispute resolution process based on the existing dataset.

I would also like to clarify two points you make below. First, EPA thinks there is more than one DQO for the collection of sediment samples as part of this effort, and will describe this in our written response to the draft QAPP worksheets. Second, it is our expectation that the Partner Agencies will be involved in this process going forward and with any future sampling efforts.

We look forward to receiving the worksheets. Call me if you have any questions. Thanks.

From: Basso, Ray
Sent: Thursday, September 03, 2015 1:36 PM
To: Michael Barbara
Cc: 'Willard Potter'; 'Robert Law'; Vaughn, Stephanie; Flanagan, Sarah; Greenberg, Marc
Subject: Re:

Mike, thanks for the follow up, there is much for us to consider here, we will get back to you shortly.

From: Michael Barbara <mab.environmental@gmail.com>
Sent: Thursday, September 3, 2015 11:24 AM
To: Basso, Ray
Cc: 'Willard Potter'; 'Robert Law'
Subject:

Ray, following up on your call on Tuesday, the Group offers the following response:

The stated purpose of this sampling effort is to support the bioaccumulation model by strengthening the basis for assigning the depth of exposure in the sediment of deposit feeding organisms. Given the impracticality of pairing measurements of COPCs in sediments and benthic organisms, the likely highly noisy BASFs that might result and the confounding factors of multiple feeding guilds, the CPG does not see a practical, relevant and achievable DQO for this study that would warrant sediment sampling. However, the Group is not opposed to discussing the Region's request for the collection of additional sediment data.

- On the conference call of August 26, the Group presented an outline of the proposed sampling, including number of locations and samples. An action item from this call was for the Group to better describe this effort and provide more details in specific QAPP Worksheets. This effort is already underway, and we anticipate having this information to Region 2 sometime next week. While we appreciate the initial response you provided, it seems to be somewhat premature given the QAPP Worksheets still need to be provided to the Region.
- We suggest that Region 2 use the information already provided, augmented with the QAPP worksheets, and provide feedback to the Group in writing as to the specifics of the sediment sampling suggested by Region 2. This will minimize any misunderstandings, and provide us with the information necessary for the Group to make an informed decision about moving forward with this sampling effort.

- It is important to reiterate the purpose of this sampling is related to strengthening the support for the assumptions in the bioaccumulation modeling to support future estimates of human health risk through the consumption pathway and will not be used in the ecological risk assessments. Hopefully, this will serve to limit the participation of all the Partner Agencies, as these data will not have a bearing on the ecological risk assessment, and will serve to expedite this process such that these data can be collected in a reasonable timeframe to support the ongoing 17 Mile RI/FS.

Please give me, Rob Law or Bill Potter a call with any questions.

Mike

Michael A. Barbara, P.E. (Ret.)

mab.environmental LLC

Office: 843.671.2032

Cell: 908.510.5703

Skype: mike.barbara52

✉ mab.environmental@gmail.com | www.mikebarbara.com

Notice: This e-mail transmission (and any attachments) may contain information that is privileged, confidential or otherwise exempt from disclosure under applicable law. This message is intended solely for the use of the individual(s) to whom it is addressed -- if you have received this in error, please contact me as soon as possible.